

# CARDOZO LAW

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November 29, 2024

**Via ECF**

Honorable John P. Cronan  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Nash v. U.S. Immigration and Customs Enforcement*, 21 Civ. 4288 (JPC)  
*Nash v. U.S. Immigration and Customs Enforcement*, 23 Civ. 6994 (JPC)

Dear Judge Cronan,

Undersigned counsel represents the plaintiff, Lindsay Nash, in the above-captioned matters. I write respectfully on behalf of both parties to provide a status update in accordance with the Court's Order of October 31, 2024, ECF No. 63. The parties have continued to confer regarding attorneys' fees and costs, which is the sole remaining issue related to the above-captioned matters. The parties hope to resolve that issue through negotiations and are currently working toward that goal, but resolving this matter through negotiations would require additional time. Accordingly, the parties propose that they submit another status letter on or before December 30, 2024, informing the Court as to proposed next steps in connection with the matter of attorneys' fees and costs.

We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Lindsay Nash*  
Lindsay Nash  
Kathryn O. Greenberg Immigration  
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